



U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**

400 Seventh St., S.W.  
Washington, D.C. 20590

DEC 27 2001

Ms. Anna West  
Thomas & Betts Corporation  
200 Challenger Drive  
Portland, TN 37148-1719

Ref. No. 01-0265

Dear Ms. West:

This is in response to your October 2, 2001 letter and subsequent telephone conversation with a member of my staff requesting clarification of the provisions in § 173.153 of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to limited quantities. You state you are shipping packages of isophorone diisocyanate under the description "Isophorone diisocyanate, 6.1, UN2290, PG III." Specifically, you request the proper labeling and marking requirements for 150 to 500 grams of isophorone diisocyanate (packaged as described in your letter) as a limited quantity under § 173.153.

The packaging must be marked "Isophorone diisocyanate", and marked with the consignee's or consignor's name and address unless excepted by § 172.301(d). The packaging (unless the package is hermetically sealed) must be marked with orientation arrows as specified in § 172.312 and labeled with the POISON label in accordance with § 172.400.

I hope this satisfies your request.

Sincerely,

Delmer F. Billings  
Chief, Standards Development  
Office of Hazardous Materials Standards



010265

173.153

BAH  
§ 173.22  
Shipper's Responsibility  
01-0265

October 2, 2001

Mr. Edward T. Madzullo  
Director of HM Standards  
USDOT/RSTA  
"DHM-10"  
400 7<sup>th</sup> Street S.W.  
Washington, D.C. 20590-0001


Dear Mr. Madzullo:

The Thomas & Betts plant at Portland, Tennessee is shipping ISOPHORONE DIISOCYANATE, 6.1, UN2290, PGIII. This is packaged in a foil packet, then sealed in a plastic bag. The quantity ranges from 150 grams to 500 grams per packet. Each part number is made up of several packets per carton (cardboard carton).

We would like the proper shipping and labeling information in writing, please. We ship the cartons by Fed-x ground and Fed-x express (air), also by over the road carriers (LTL). I have discussed this with HMDOT by phone, but would greatly appreciate your information in writing for our files.

Thank you for your response.

Very truly yours,



Anna West  
Thomas & Betts Corporation

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**Thomas & Betts**